

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CAMELOT EVENT DRIVEN FUND, A
SERIES OF FRANK GROUP TRUST,

Plaintiff,

vs.

ALTA MESA RESOURCES, INC., *et al.*,

Defendants.

Civ. A. No. 4:19-cv-00957

Hon. George C. Hanks, Jr.

FNY PARTNERS FUND LP, *et al.*,

Plaintiffs,

vs.

ALTA MESA RESOURCES, INC., *et al.*,

Defendants.

Civ. A. No. 4:19-cv-01027

Hon. Charles R. Eskridge

PLUMBERS AND PIPEFITTERS
NATIONAL PENSION FUND,

Plaintiff,

vs.

ALTA MESA RESOURCES, INC., *et al.*,

Defendants,

Civ. A. No. 4:19-cv-02982

Hon. Lynn N. Hughes

**STIPULATION OF LEAD PLAINTIFF MOVANTS AND [PROPOSED] ORDER
CONCERNING MOTIONS FOR APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF COUNSEL**

WHEREAS, three securities class actions are pending in the United States District Court for the Southern District of Texas (the “Actions”), captioned *Camelot Event Driven Fund, a Series of Frank Group Trust v. Alta Mesa Resources, Inc., et al.*, No. 19-cv-00957 (the “Camelot Action”); *FNY Partners Fund LP and FNY Managed Accounts, LLC v. Alta Mesa Resources, Inc., et al.*, No. 19-cv-01027 (the “FNY Action”); and *Plumbers and Pipefitters National Pension Fund v. Alta Mesa Resources, Inc. et al.*, No. 4:19-cv-02982 (the “Plumbers Action”);

WHEREAS, on April 1, 2019, plaintiffs in each of the Actions filed motions to consolidate the actions, to be appointed as lead plaintiff for the Actions, and for approval of their respective selections of counsel to serve as lead counsel in the Actions (the “Lead Plaintiff Motions”). (See Camelot Action ECF Nos. 8, 9, 11; FNY Action ECF No. 13; Plumbers Action ECF Nos. 12, 17, 18).

WHEREAS, on December 19, 2019, an initial conference was held, during which the Actions were consolidated (the “Consolidated Actions”) and the remaining relief sought by the Lead Plaintiff Motions was taken under advisement, and those motions remain pending;

WHEREAS, the plaintiffs believe that the interests of the putative class in the Consolidated Actions is best served by agreement and cooperation among the plaintiffs in a leadership structure that resolves the pending Lead Plaintiff Motions and promotes efficiency; and

WHEREAS, the plaintiffs have consulted with defendants in the Consolidated Actions, who do not object to the agreement memorialized in this Stipulation and Order.

WHEREFORE, the parties, by and through their undersigned counsel, hereby stipulate and request that the court enter this stipulation as an order as follows:

1. The Consolidated Actions and any later-filed related actions shall proceed as a single class action under the title *In re Alta Mesa Resources, Inc. Securities Litigation*;

2. The First New York Group (consisting of FNY Partners Fund LP, FNY Managed Accounts, LLC and Paul J. Burbach) and Plumbers and Pipefitters National Pension Fund will be appointed and will serve as Co-Lead Plaintiffs for the class in the Consolidated Actions;

3. Camelot Event Driven Fund will serve as an additional class representative in the Consolidated Actions;

4. The First New York Group's counsel, Entwistle & Cappucci LLP, and Plumbers and Pipefitters National Pension Fund's counsel, Robbins Geller Rudman & Dowd LLP, will together serve as Co-Lead Counsel for the class in the Consolidated Actions. Entwistle & Cappucci will also serve as bankruptcy counsel for the class;

5. Camelot Event Driven Fund's counsel, Labaton Sucharow LLP, will serve as additional plaintiffs' counsel in the Consolidated Actions;

6. The Lead Plaintiffs and class representative will file their consolidated amended class action complaint within 60 days after entry of the Order approving this Stipulation; and

7. The Lead Plaintiff Motions are hereby resolved as provided in this Stipulation and Order.

DATED: January 13, 2020

Respectfully submitted,

/s/ Andrew J. Entwistle
Andrew J. Entwistle
Attorney-in-Charge
(Texas Bar No. 24038131)
ENTWISTLE & CAPPUCCI LLP
500 W 2nd Street, Floor 19, Suite 140
Austin, TX 78701
(512) 710-5960
aentwistle@entwistle-law.com

*Lead Counsel for Plaintiff FNY
Partners Fund LP, FNY Managed
Accounts, LLC and Paul J. Burbach*

/s/ David A. Rosenfeld
David A. Rosenfeld
(Attorney-in-Charge)
ROBBINS GELLER RUDMAN & DOWD LLP
58 South Service Road, Suite 200
Melville, NY 11747
(631) 367-7100
DRosenfeld@rgrdlaw.com

*Lead Counsel for Plumbers and Pipefitters
National Pension Fund*

/s/ Francis P. McConville

Francis P. McConville
(Attorney-in-Charge)
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
(212) 907-0650
fmccconville@labaton.com

*Counsel for Plaintiff Camelot Event
Driven Fund, A Series of Frank Funds
Trust*

Jason A. Richardson
(Texas Bar. No. 24056206)
McDOWELL HETHERINGTON LLP
1001 Fannin Street, Suite 2700
Houston, TX 77002
(713) 337-8872
Jason.Richardson@mhllp.com

*Counsel for Plumbers and Pipefitters National
Pension Fund*

SO ORDERED:

_____, U.S.D.J.